

EXHIBIT 4

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Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

MDL No. 3084

**DEFENDANTS UBER TECHNOLOGIES,
INC., RASIER, LCC, AND RASIER-CA,
LLC'S AMENDED PROPOSED WITNESS
LIST**

This Document Relates to:

Jaylynn Dean v. Uber Technologies, Inc., et al.,
No. 3:23-cv-06708

Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (“Defendants”)

submit the following amended list of witnesses to testify at the trial of this matter:

1 Defendants will likely call the following expert witnesses at trial:

2 1. **Sarah Kauffman, M.D.**

3 Defendants expect Dr. Kauffman to testify consistent with her report and deposition
4 concerning Dr. Mechanic's evaluation of Plaintiff.

5 2. **Jason Morris**

6 Defendants expect Mr. Morris to testify consistent with his reports and deposition concerning
7 Uber's background check and process.

8 3. **Joseph Okpaku, J.D.**

9 Defendants expect Mr. Okpaku to testify consistent with his report and deposition concerning
10 Uber's control over the conduct of third-party drivers; industry standards regarding safety in for-hire
11 transportation; regulatory frameworks applicable to the rideshare industry, regulatory initiatives in
12 response to the same; Uber's safety policies and practices; and the comparative safety of rideshares
13 versus other forms of transportation.

14 4. **Eric L. Piza, Ph.D.**

15 Defendants expect Dr. Piza to testify consistent with his report and deposition concerning the
16 deterrent effect of video surveillance technologies on criminal conduct, if any; including the likely
17 deterrent impact, if any, of dashcams in rideshares like Uber.

18 5. **Victoria Stodden, Ph.D.**

19 Defendants expect Dr. Stodden to testify consistent with his report and deposition concerning
20 Uber Safety Reports, statistical rate of sexual assault and/or misconduct that occurs during Uber
21 rides; and comparative rates of sexual assault/misconduct in alternative transportation services and
22 within the United States.

23 6. **Vida Thomas**

24 Defendants expect Ms. Thomas to testify consistent with her reports and depositions
25 concerning human resources practices for investigating and responding to allegations of sexual
26 assault and Uber's policies related to same.

1 **7. Christopher Wilson**

2 Defendants expect Mr. Wilson to testify consistent with his report and deposition concerning
3 technical challenges to universal, mandatory implementation of a dashcam program or in-app video
4 recording.

5 **8. Kristen M. Zgoba, Ph.D.,**

6 Defendants expect Dr. Zgoba to testify consistent with her report and deposition concerning
7 rates of sexual assault and sexual misconduct and factors impacting those rates; Uber's Taxonomy;
8 Uber's background checks; and limitations to predicting first time sexual offenders.

9 Defendants will likely call the following fact witnesses at trial:

10 **1. Michael Akamine (by deposition)**

11 Mr. Akamine will testify concerning Uber's efforts to reduce safety incidents on the Uber
12 platform.

13 **2. Emilie Boman (live)**

14 Defendants expect Ms. Boman to testify concerning Uber's efforts to reduce sexual
15 assault/sexual misconduct on the platform and its work with internal and external stakeholders
16 regarding women's safety.

17 **3. Greg Brown (by deposition)**

18 Mr. Brown will testify about Hassan Turay's education and Uber's investigation into prior
19 complaints related to Mr. Turay.

20 **4. Frank Chang (by deposition)**

21 Mr. Chang will testify about Uber's efforts to issue its Safety Reports and Uber's investment
22 in safety.

23 **5. Heather Childs (live or by deposition)**

24 Defendants expect Ms. Childs to testify concerning Uber's Law Enforcement/Public Safety
25 Response Team and other safety-related efforts.

26 **6. Chad Dobbs (live)**

27 Defendants expect Mr. Dobbs to testify concerning Uber's lack of control over third-party

1 independent drivers and Uber's independent contractor model.

2 **7. Todd Gaddis (live)**

3 Defendants expect Mr. Gaddis to testify consistent with his declaration concerning the
4 absence of in-app audio recording on the subject trip, as well as Uber's Safety Reports and incident
5 data.

6 **8. Elisa Gregg (by deposition)**

7 Ms. Gregg will testify about her knowledge of Plaintiff's background, mental health, and the
8 events surrounding the alleged assault by Mr. Turay.

9 **9. Roger Kaiser (by deposition)**

10 Mr. Kaiser will testify about Uber's commitment to safety and work with law enforcement.

11 **10. Sachin Kansal (live)**

12 Defendants expect Mr. Kansal to testify concerning Uber's commitment to safety during his
13 tenure at the company, including Uber's release of multiple safety features over time.

14 **11. Detective Oscar Lopez, Tempe Police Department (live)**

15 Detective Lopez was the lead investigator in Plaintiff's case and is expected to testify
16 concerning his investigation into the alleged assault and various Tempe PD records.

17 **12. Scott McLaughlin (by deposition)**

18 Mr. McLaughlin will testify about his interactions with and observations of Plaintiff
19 immediately prior to the subject ride and communications with Plaintiff following the encounter.

20 **13. Hannah Nilles (by deposition)**

21 Ms. Nilles will testify concerning Mr. Turay's background check and onboarding process.

22 **14. Hassan Turay (by deposition)**

23 Mr. Turay, the driver, will testify concerning the subject ride and communications with law
24 enforcement following the encounter with Plaintiff.

25 **15. Jessica Weaver (by deposition)**

26 Ms. Weaver is the nurse who administered Plaintiff's SANE exam and will testify
27 concerning that exam.

1 **16. Corporate representative of custodian of records for the Tempe Police
2 Department (live)**

3 Defendants expect this witness to authenticate Tempe Police Department documents, dash
4 cam videos, and audio recordings related to the investigation of Plaintiff's sexual assault report if the
5 parties cannot reach a stipulation about the admissibility of these records and recordings.

6 In addition to the above witnesses, Defendants reserve the right to call at trial any of the
7 following:

- 8 1. Any witness, including expert witnesses, named by Plaintiff. Defendants specifically
9 reserve their right to designate affirmative deposition testimony of Defendants'
10 company witnesses called by Plaintiff;
- 11 2. Any custodian of records or other witness needed to authenticate documents; and
- 12 3. Any additional expert or non-expert witness not listed herein for the purposes of
13 impeachment or rebuttal.

14 Defendants reserve the right to amend and/or supplement this Witness List.

15 Dated: December 12, 2025

KIRKLAND & ELLIS LLP

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